

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.,
CUSTOMER DATA SECURITY
BREACH LITIGATION

*This Document Relates To:
Other Labs Track*

Case No. 2:19-MD-02904-MCA-MAH

MDL 2904

**DECLARATION OF ABAIGEAL D.
FRANSON IN SUPPORT OF
MOTION TO ADMIT PRO HAC
VICE**

I, Abaigeal D. Franson, Esq., declare as follows subject to the penalties of perjury:

1. I am an associate with the firm of Lewis Brisbois Bisgaard & Smith LLP.

2. I submit this Declaration in Support of my motion for admission to practice pro hac vice in the above captioned matter as co-counsel for Defendants Sonic Healthcare USA, Clinical Pathology Laboratories, Inc., Aurora Diagnostics LLC, and Austin Pathology Associates (“Sonic Defendants”).

3. I am a member in good standing of the bar in every court in which I am admitted to practice, which are: New York State, United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.

4. Pursuant to Local Rule 101.1(c), below is a chart listing the bar of each

State or Federal Court to which I have been admitted, including the date of admission and the name and address of the official or office maintaining the roll of members of each bar:

a. New York State

i. Date of Admission: September 18, 2023

ii. Name & Address: New York State Unified Court System,
Office of Court Administration Attorney Registration Unit,
25 Beaver Street, Room 840, New York, NY 10004

b. United States District Court for the Southern District of New York

i. Date of Admission: October 3, 2023

ii. Name & Address: U.S. District Court, SDNY, Attorney
Services, Daniel Patrick Moynihan, U.S. Courthouse, 500
Pearl Street, Rm. 250, New York, NY 10007

c. United States District Court for the Eastern District of New York

i. Date of Admission: June 4, 2023

ii. Name & Address: U.S. District Court, EDNY, Attorney
Admissions, 225 Cadman Plaza East, Brooklyn, NY 11201

5. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

6. There are no pending disciplinary proceedings against me in any state

or federal court.

7. I understand my continuing obligation during the period of my admission to advise the Court of any disciplinary proceedings that may be instituted against me.

8. If the Court grants my *pro hac vice* admission, I agree that I shall be subject to the orders and be amenable to disciplinary action and the civil jurisdiction of the Court in all respects as if I were regularly admitted and a licensed member of the Bar of this Court in good standing.

9. I certify that the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

10. I agree to pay the Clerk's fee and the appropriate fees for the client fund and agree to abide by Local Rule 101.1(c).

Wherefore, I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this case for the Sonic Defendants.

Dated: May 19, 2025

/s/ Abaigeal D. Franson
Abaigeal D. Franson